

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
C.A. No. 1:19-cv-00410-TDS-JEP**

RONNIE LEE SANDERS,

Plaintiff,

v.

**SMITH DEBNAM NARRON DRAKE
SAINTSING & MYERS, LLP and
FIRST TECHNOLOGY FEDERAL
CREDIT UNION,**

Defendants.

**DEFENDANT SMITH DEBNAM NARRON DRAKE SAINTSING & MYERS,
LLP'S MOTION FOR JUDGMENT ON THE PLEADINGS**

NOW COMES defendant Smith Debnam Narron Drake Saintsing & Myers, LLP (“Smith Debnam”) and, pursuant to Rule 12(c) of the Federal Rules of Civil Procedure, moves the Court for judgment on the pleadings;

AND IN SUPPORT OF THIS MOTION, Smith Debnam shows unto the Court as follows:

1. The pleadings are closed and this motion will not delay any trial.
2. For the reasons set forth more particularly in the Memorandum filed contemporaneously with this motion, Smith Debnam is entitled to judgment on the pleadings because, even taking all allegations in the Amended Complaint (ECF No. 3) as true, there are no genuine issues of material fact and Smith Debnam is entitled to judgment as a matter of law.

WHEREFORE, Smith Debnam respectfully requests the Court grant it judgment on the pleadings pursuant to Rule 12(c) of the Federal Rules of Civil Procedure on all counts against it in the Amended Complaint.

This the 12th day of November 2020.

/s/ Caren D. Enloe
Caren D. Enloe
NC Bar No. 17394
cenloe@smithdebnamlaw.com
Landon G. Van Winkle
NC Bar No. 52590
lvankle@smithdebnamlaw.com
SMITH DEBNAM NARRON DRAKE
SAINTSING & MYERS, LLP
PO Box 176010
Raleigh, NC 27619-6010
Telephone: (919) 250-2000
Telefacsimile: (919) 250-2124
*Attorneys for Defendant Smith Debnam
Narron Drake Saintsing & Myers, LLP*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was served electronically upon the following via CM/ECF:

Jonathan R. Miller
Law Office of Jonathan Miller, LLC
449 N. Euclid Ave., Ste. 140
St. Louis, MO 63108
314-582-1892
Email: jonathan@sltconsumerlaw.com
Counsel for Plaintiff

Jeffrey B. Kuykendal
McAngus, Goudelock and Courie, PLLC
PO Box 30307
Charlotte, NC 28230
Email: Jeffrey.kuykendal@mgclaw.com
*Counsel for Defendant First Technology
Federal Credit Union*

This the 12th day of November 2020.

/s/ Caren D. Enloe
Caren D. Enloe
SMITH DEBNAM NARRON DRAKE
SAINTSING & MYERS, LLP
PO Box 176010
Raleigh, NC 27619-6010
Telephone: (919) 250-2000
Telefacsimile: (919) 250-2124
*Attorneys for Defendant Smith Debnam
Narron Drake Saintsing & Myers, LLP*